

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)
IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)
_____)

MDL NO. 1456
Civil Action No. 01-12257-PBS

_____)
THIS DOCUMENT RELATES TO:)
_____)

International Union of Operating)
Engineers, Local No. 68 Welfare)
Fund v. AstraZeneca PLC et al.)
Civil Action No. 04-11503-PBS)
_____)

**DEFENDANT GLAXOSMITHKLINE'S
LOCAL RULE 16.1(D)(3) CERTIFICATION**

Pursuant to Local Rule 16.1(D)(3), defendant SmithKline Beecham Corporation d/b/a GlaxoSmithKline and its attorneys hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course—and various alternative courses—for the above-captioned litigation and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution mechanisms such as those outlined in Local Rule 16.4.

By its attorneys:

GLAXOSMITHKLINE



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Beth J. Halleyburton
Assistant General Counsel

CERTIFICATE OF SERVICE

I certify that on April 13, 2005, a true and correct copy of Defendant GlaxoSmithKline's Local Rule 16.1(D)(3) Certification was served on all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to Verilaw Technologies for posting and notification to all parties.

A handwritten signature in black ink, appearing to read "Ronald G. Dove, Jr.", written over a horizontal line.

Ronald G. Dove, Jr.